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 KAZUKO UMSTEAD

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

WELLS FARGO BANK, TRUSTEE OF THE )  
 CLARA POPPIC TRUST, )

Plaintiffs, )

vs. )

RENZ, *et al.*, )

Defendants. )

Case No. CV 08 2561 SBA

**DEFENDANT KAZUKO UMSTEAD'S  
 INITIAL DISCLOSURES PURSUANT TO  
 FEDERAL RULE OF CIVIL  
 PROCEDURE 26(a)(1)**

Complaint Filed: May 21, 2008

Trial Date: None Set

Pursuant to Federal Rules of Civil Procedure Rule 26 Defendant KAZUKO UMSTEAD  
 ("UMSTEAD") hereby submits its initial disclosures.

**I. Witnesses [Federal Rule of Civil Procedure 26(a)(1)(A)(i)]**

The foregoing are the names, addresses, and telephone numbers of witnesses with  
 information relevant to this litigation pursuant to Federal Rules of Civil Procedure Rule  
 26(a)(1)(A)(i):

1. Kazuko Umstead, c/o Bassi, Martini, Edlin, and Blum, LLP, 351  
 California St., Suite 200, San Francisco, California 94104; Tel: 415-397-

1 9006. Subjects include, but are not limited to UMSTEAD's interest and  
2 relationship to the site, operation of the site during a portion of the time a  
3 drycleaner operated thereon, and sale of the dry cleaner business which  
4 operated there;

5  
6 2. Guan Huang ("HUANG"), 2683 22nd Street, San Francisco, California  
7 94110; Tel: Unknown. Subjects include, but are not limited to HUANG's  
8 interest and relationship to the site, the alleged contamination of the site  
9 and other matters related to the purchase, operation and sale of the site and  
10 dry cleaner businesses which operated there;

11  
12 3. Sui Song ("SONG"), 1650 13th Avenue, Oakland, California 94606; Tel:  
13 Unknown. Subjects include, but are not limited to SONG's interest and  
14 relationship to the site, the alleged contamination of the site and other  
15 matters related to the purchase, operation and sale of the site and dry  
16 cleaner businesses which operated there;

17  
18 4. Nan Young Park ("PARK"), 1468 Willowbend Way, Beaumont,  
19 California 92223; Tel: Unknown. Subjects include operation and sale of  
20 the site and dry cleaner business which operated there;

21  
22 5. Kenneth G. Renz ("RENZ"), 783 Crossbrook Drive, Moraga, California  
23 94556; Tel: Unknown. Subjects include, but are not limited to RENZ's  
24 interest and relationship to the site, the alleged contamination of the site  
25 and other matters related to the purchase, operation and sale of the site and  
26 dry cleaner businesses which operated there.;

- 1           6.     Won Jae Yi ("WON JAE YI"), 2545 Telegraph Avenue, Berkeley,  
2           California 94704; Tel: Unknown. Subjects include, but are not limited to  
3           WON JAE YI's interest and relationship to the site, the alleged  
4           contamination of the site and other matters related to the purchase,  
5           operation and sale of the site and dry cleaner businesses which operated  
6           there;  
7
- 8           7.     Michael Yi ("MICHAEL YI"), 2545 Telegraph Avenue, Berkeley,  
9           California 94704; Tel: Unknown. Subjects include, but are not limited to  
10          MICHAEL YI's interest and relationship to the site, the alleged  
11          contamination of the site and other matters related to the purchase,  
12          operation and sale of the site and dry cleaner businesses which operated  
13          there;  
14
- 15          8.     Ying Zhang ("ZHANG"), 213 Brush Street, Alameda, California 94501;  
16          Tel: Unknown. Subjects include, but are not limited to ZHANG's interest  
17          and relationship to the site, the alleged contamination of the site and other  
18          matters related to the purchase, operation and sale of the site and dry  
19          cleaner businesses which operated there;  
20
- 21          9.     Employees and former employees of Plaintiff Wells Fargo Bank,  
22          addresses and telephone information known to Plaintiff. Subjects include,  
23          but are not limited to Plaintiff's interest and relationship to the site, the  
24          alleged contamination of the site and other matters related to the purchase,  
25          operation and sale of the site and dry cleaner businesses which operated  
26          there;  
27  
28

- 1           10. Employees and former employees of environmental consultants retained  
2           by Plaintiff. Subjects include the scope and cost of remediation of the  
3           alleged contamination and Plaintiff's damages related thereto;  
4
- 5           11. Geoffre Fiedler, employee of the city of Berkeley, Toxics Management  
6           Division, responsible for project management for the city, 2118 Milvia  
7           Street, Berkeley, California 94704; Tel: 510-981-7460. Subjects include,  
8           but are not limited to, the investigation and remediation at the site as well  
9           as the history of the site;  
10
- 11          12. Henry Poppic, who acted as a co-trustee for the Clara Poppic Trust at  
12          relevant time periods, address and telephone number unknown. Subjects  
13          include, but are not limited to Plaintiff's construction of the building,  
14          permitting of the site for a dry cleaner, interest and relationship to the site,  
15          the alleged contamination of the site and other matters related to the  
16          purchase, operation and sale of the site and dry cleaner businesses which  
17          operated there during relevant time periods.; and  
18
- 19          13. Employees and former employees of Crocker National Bank, which acted  
20          as a co-trustee for the Clara Poppic Trust at relevant time periods, current  
21          address and telephone number unknown. Subjects include, but are not  
22          limited to Plaintiff's construction of the building, permitting of the site for  
23          a dry cleaner, interest and relationship to the site, the alleged  
24          contamination of the site and other matters related to the purchase,  
25          operation and sale of the site and dry cleaner businesses which operated  
26          there during relevant time periods.  
27  
28

1 **II. Documents [Federal Rule of Civil Procedure 26(a)(1)(A)(ii)]**

2 The foregoing are documents relevant to this litigation pursuant to Federal Rules of Civil  
3 Procedure Rule 26(a)(1)(A)(ii):

- 4
- 5 1. Documents received from the City of Berkeley, including inspection  
6 reports of the dry-cleaning business that operated at the site during the  
7 relevant time periods;
  - 8
  - 9 2. Documents received from the County of Alameda, including construction  
10 and permitting documents related to the building, appurtenances, and dry-  
11 cleaning business that operated at the site during the relevant time periods;  
12 and
  - 13
  - 14 3. Lease documents related to the lease of the site during relevant time  
15 periods.
  - 16

17 Said documents are located at the law offices of Bassi, Martini, Edlin and Blum, LLP,  
18 351 California Street, San Francisco, California 94104; Tel: 415-397-9006. Arrangements will  
19 be made upon request either to provide copies of non-protected/non-privileged documents or to  
20 make them available for inspection and copying.

21

22 **III. Damages [Federal Rule of Civil Procedure 26(a)(1)(A)(iii)]**

23 The foregoing are damages suffered by UMSTEAD relevant to this litigation pursuant to  
24 Federal Rules of Civil Procedure Rule 26(a)(1)(A)(iii):

- 25
- 26 1. Attorneys fees in an amount yet to be determined;
  - 27
  - 28

2. General economic and consequential damages of an amount to be determined;

3. Costs of investigation, testing, remediation and clean-up of the contamination on, under, adjacent or downgradient from the site and the surrounding areas in an amount yet to be determined.

**III. Damages [Federal Rule of Civil Procedure 26(a)(1)(A)(iv)]**

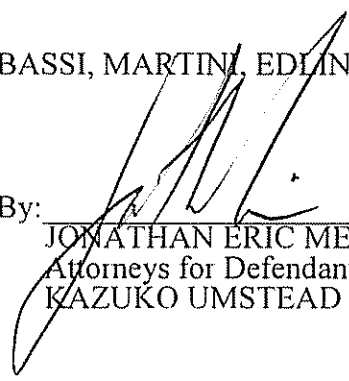
The foregoing relates to UMSTEAD's insurance pursuant to Federal Rules of Civil Procedure Rule 26(a)(1)(A)(iv):

1. None. Investigation continues.

Date: August 26, 2008

BASSI, MARTINI, EDLIN & BLUM LLP

By:

  
JONATHAN ERIC MEISLIN  
Attorneys for Defendant  
KAZUKO UMSTEAD

1 Re: **Wells Fargo Bank, Trustee of the Clara Poppic Trust v. Renz, et al.**  
2 **United States District Court, Northern District Case No. CV 08 2561 EMC**

3 **PROOF OF SERVICE – CCP §1013(a)(3)**

4 STATE OF CALIFORNIA/COUNTY OF San Francisco

5 I am a citizen of the United States and an employee in the County of San Francisco. I am  
6 over the age of eighteen (18) years and not a party to the within action. My business address is  
BASSI, MARTINI, EDLIN & BLUM LLP, 351 California Street, Suite 200, San Francisco,  
California 94104.

7  
8 On the date executed below, I electronically served the document(s) via ECF, Northern  
District of California's court's website, described below, on the recipients designated on the  
Transaction Receipt located on the court's website:

9  
10 **DEFENDANT KAZUKO UMSTEAD'S INITIAL DISCLOSURES PURSUANT TO  
FEDERAL RULE OF CIVIL PROCEDURE 26(a)(1)**

11 on the following parties:

12 SEE ECF'S ELECTRONIC SERVICE LIST

13  
14 I declare under penalty of perjury that the foregoing is true and correct and that this  
document is executed on August 26, 2008, at San Francisco, California.

15  
16 

17 CHRISTINE GILL